

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

Joseph L. Manson, III)	
)	
Plaintiff/Stakeholder,)	
)	
v.)	1:18-cv-219 CMH/JFA
)	
Universitas Education, LLC, et al)	
)	
Defendants/Claimants)	

**MEMORANDUM IN SUPPORT OF UNIVERSITAS EDUCATION, LLC’S
UNOPPOSED MOTION TO EXTEND TIME FOR FILING RESPONSIVE PLEADING**

COME NOW THE PARTY, Universitas Education LLC (“Universitas”) by counsel, and pursuant to the Federal Rules of Civil Procedure, files this Memorandum in Support of its Unopposed Motion to Extend Time for Filing Responsive Pleading, setting forth the following:

1. Defendant/Claimant Sturm Law PLLC (“Sturm”) filed cross-claims against Universitas Education, LLC (“Universitas”) amongst others on August, 10, 2018.
2. Without prejudice to Sturm’s position on new counsel, Universitas has retained new counsel who will be entering his appearance and responding on Universitas’ behalf.
3. The parties believe a one-week extension of the deadline by which Universitas must respond will not negatively affect the timing in this case.
4. The parties wish to extend the time for Universitas to file its responsive pleadings until September 7, 2018.
5. The parties agree to waive hearing on this motion.

6. The Parties join in requesting the extension described herein, pursuant to Fed. R. Civ. P. 6(b)(1), in accordance with the proposed order which is attached as Exhibit 1.

Wherefore, in consideration of the foregoing, the parties respectfully move this Court to extend time for Universitas to file its responsive pleadings to September 7, 2018 and grant them such other and further relief as the Court deems just and appropriate.

Respectfully Submitted

_____/s/_____
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Attorney for Universitas Education, LLC

Certificate of Service

I hereby certify that on August 30, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing (NEF) to counsel of record. I also certify that a copy of the foregoing was mailed, U.S. Mail, first-class, postage pre-paid, to the following parties not yet receiving a NEF from the Court:

Shannon A. Lang
Lang & Associates, PLLC
440 Louisiana St., Suite 900
Houston, TX 77002

_____/s/_____
Robert K. Moir